



SARATOGA-ENCAMPMENT-RAWLINS CONSERVATION DISTRICT

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August 20, 2018

Medicine Bow National Forest
Melissa Martin, LaVA Project Manager
2468 Jackson Street
Laramie, WY 82070

Submitted electronically

RE: EIS No. 20180150, Draft, USFS, WY, Medicine Bow Landscape Vegetation Analysis Project

Dear Ms. Martin,

The Saratoga-Encampment-Rawlins Conservation District (SER CD) appreciates the opportunity to actively engage as a cooperating agency throughout the National Environmental Policy Act process for the Medicine Bow Landscape Vegetation Analysis (LaVA) Project. We support the United States Forest Service (FS) in their efforts to work collaboratively to identify management decisions that are best suited to local needs and concerns in the LaVA project area. The following comments are regarding the Draft Environmental Impact Statement (DEIS).

Our comments are specific to our mission as a local Wyoming government entity: develop and direct programs to promote long-term conservation and enhancement of our natural resources while contributing to the economic stability of the district and its residents. SER CD is one of thirty-four conservation districts in Wyoming operating as a legal subdivision of the state of Wyoming, Wyo. Stat. §§ 11-16-102(a)(v), 11-16-113(c). Each conservation district is governed by a board of five locally elected supervisors who serve without pay. Conservation districts are the only local government charged, specifically by state statute, with natural resource management. District supervisors serve as the grass roots representatives of private landowners and the general public, providing leadership and direction in natural resource conservation programs.

We want to commend the efforts of the LaVA Project leadership for including cooperating agencies early in the development and design of the project. Responsiveness to cooperating agencies' issues and concerns is appreciated and greatly approved from pre-LaVA timeframe projects.

General Comments

- 1) The SER CD strongly supports the Modified Proposed Action (Proposed Action) and vegetation management activities, including prescribed fire, mechanical, and hand treatment methods, could be applied on up to 360,000 acres to make areas more resilient to future disturbance; protect, restore, and enhance forest ecosystem components; supply forest products to local industries; provide for human safety; reduce wildfire risk to communities, infrastructure, and municipal water supplies; and improve,

protect, and restore wildlife habitat. The LaVA Project area has changed dramatically over the past fifteen years. The change in forest vegetation cover types creates future conditions that are not in conformance with forest plan desired conditions, standards, and guidelines for the provision of wood products.

- 2) The SER CD agrees with the identified purposes and associated needs for the project. SER CD's comments are based upon the Long Range Land Use and Natural Resource Management Plan for SER CD 2017-2021 (SER CD Long Range Plan) that includes policy statements developed, open for public comment, adopted by the SER CD Board of Supervisors, and filed with the Carbon County Clerk. SER CD Long Range Plan policy statements supporting the stated purposed and needs are:

Policy Vegetation - General #1: The District supports local, state, and federal land managers in proper management of forest and other public lands through Best Management Practices (BMPs) including, but not limited to, timbering, select cutting, fire management, and managed grazing practices for the prevention of catastrophic wildfires.

Policy Vegetation - Conservation Forestry #1: The District supports managing vegetation in a trajectory toward the historic range of variability for age class distribution, patch size, and vegetative composition. Manage for a mosaic of vegetative communities focusing on the Medicine Bow National Forest Historic Range of Variability for management of age classes as allowed per elevation, edaphic, and topographic influences.

Policy Vegetation - Conservation Forestry #2: The District insists active management of forested lands shall consider timber yield to maintain health of stands to provide wildlife habitat, minimize erosion of soils, and continue soil stability.

Policy Vegetation - Conservation Forestry #4: The District urges USFS to support salvage timber sales and other sales wherever stands of trees require this to maintain a healthy, viable forest and that reduce the amount of dead wood accumulation with National Forests.

Policy Vegetation - Conservation Forestry #5: The District supports the Secretary of Agriculture or Interior and their efforts to conduct fuel reduction treatments in the urban wildland interface within the vicinity of federal lands that are at risk from wildfire.

Policy Vegetation - Conservation Forestry #6: The District supports accelerated forest thinning at large scales to improve the water balance and resilience of forests and sustain the ecosystem services they provide.

Policy Wildlife #1: The District promotes wildlife conservation, sustainability of healthy wildlife habitat and populations, and their contributions to the local economy.

- 3) The Medicine Bow National Forest produces a suite of ecosystem services that benefit local, regional, and national populations. The SER CD Long Range Plan Ecosystem Services Policy #1 states *"The District will ensure ecosystem services as defined and outlined by the National Agricultural Statistics Service Wyoming Agricultural Statistics report are analyzed to the full extent within all NEPA documents and subsequent actions."* While the DEIS mentions ecosystem services in general, the SER CD encourages the FS to more fully analyze the impacts and environmental consequences on ecosystem services as a result of the Proposed Action.

- 4) The DEIS is weak in acknowledging that there will be continued timber sales and vegetation management activities on the forest through separate NEPA processes. Information on this topic should be stated clearly at the beginning of the document and in the document summary.
- 5) The life of the LaVA project is much longer than what we are traditionally accustomed. Staff turnover with the FS and cooperating agencies will occur. The SER CD recommends including a section in Chapter 4, Administrative Material, that presents how the Proposed Action will continue even though staff turnover occurs. Information should also be included as to how new staff will be briefed on the project to fully understand the LaVA Project and its intricacies.
- 6) There are inconsistencies in how transportation and roads are addressed and presented in the document. It needs to be clear for each instance that only temporary roads are authorized in the Proposed Actions. The word “temporary” always should be included when talking about building roads.
- 7) The cumulative effects narratives in Chapter 3 are very weak and some are absent. They do not include information on effects from past, on-going, and foreseeable future projects. The SER CD requests a thorough analysis of cumulative effects be conducted and included in the Final EIS.

Specific Comments

The SER CD provides the following specific comments on the DEIS.

- 8) **Summary, Table 1, page iv:** This table needs to be updated per specific comments (xx – xx) as a summary of DEIS Table 17.
- 9) **Chapter 1, Synopsis of the Modified Proposed Action, page 2:** The SER CD suggests changing the wording from “Other proposed activities include:” to “General proposed activities that could occur in one or more of the three distinct categories within the Proposed Action include:”. Clarification is needed. As currently written, it could be interpreted that the “other activities” are in addition to the vegetation treatments described.
- 10) **Chapter 1, Hazardous Fuel Loading and Protection of Infrastructure, page 6.** This narrative is vital for laying the foundation for impacts in Chapter 3.
 - a. The SER CD strongly encourages the FS to expand and enhance this section to include more information on the risk of large-scale, high severity wildfires and the associated public and firefighter risks.
 - b. As a cooperating agency, we have been actively involved with the FS so know that as current conditions exist, the potential for catastrophic wildfires is high. The SER CD strongly suggests that a more robust narrative detailing this potential is needed. The narrative should include information on fire being a natural process, but the post beetle-epidemics fires have not displayed traditional fire behavior.
 - c. In the second paragraph, line 7, expand upon “human health and safety”. While this is an often-used term, we believe it warrants a longer narrative to further explain the breadth of what humans and what kind of safety.
 - d. In the second paragraph, line 8, expand upon “other values at risk”. While this term is used by government entities, we believe it warrants a longer narrative to further explain to the public.

We can assume that “other values” includes wildlife habitat, watershed health, municipal water supply” but it is best to be clear so that each reader has the same level of understanding.

- 11) **Chapter 1, *Merchantability of Forest Products*, pages 14, last line and page 15, first line:** “...while the remaining management areas contain no suitable acres.” Where is the information to support this statement? Table 8 on page 20 doesn’t reflect this at all. Please modify or clarify.
- 12) **Chapter 1, *Purpose and Need for Action*, page 15:** The SER CD is a strong supporter of consistency within the DEIS. The stated purpose and need should be the exact same where ever stated in reference to the LaVA project and the Proposed Action. Even though they may mean the same thing, they should become like a mission statement and quoted the same every time. Currently, they are slightly different on page 2 and page 15.
- 13) **Chapter 2, Chapter Summary, page 27:** The SER CD recommends a brief narrative be included before the bulleted list for the Summary. Consistency. The bulleted list should include all of the modified proposed actions and these should be consistently stated throughout the document. Per the narrative list on page 31, “Noxious weed control” and “Native grass & forb seeding” should be added to the page 27 list.
- 14) **Chapter 2, Chapter Summary, page 27:** The SER CD recommends adding the statement “See Chapter 2, pages 47-48.” after “...analyzed in detail.”
- 15) **Chapter 2, Alternative 1 – No Action, page 28:** The SER CD recommends adding a statement to the narrative such as “Other timber harvest and vegetation management actions will continue on the Medicine Bow National Forest as authorized by current or future NEPA.” The current list of activities for management plans provided makes it appear as the LaVA is the only vegetation/timber management plan option.
- 16) **Chapter 2, Alternative 1 – No Action, page 28:** The SER CD strongly disagrees with the last statement in the narrative “No additional timber harvest, salvage, silvicultural treatments, or changes to the existing designated road and motorized trail systems would be implemented to accomplish project goals.” It makes it sound like this is the only NEPA option to accomplish the goals outlined. The SER CD disagrees with this statement. Other NEPA is ongoing to accomplish the same goals on a smaller scale which is costlier and time consuming but still happening.
- 17) **Chapter 2, Alternative 2 – The Modified Proposed Action (Agency Preferred), page 30:** Consistency. The SER CD recommends the bulleted list include all of the modified proposed actions and these should be consistently stated throughout the document. The list is repeated several times, so it could be placed in a table and then reference to the table each time would insure consistency of proposed action representation.
- 18) **Chapter 2, Table 17, pages 50-56:** The SER CD strongly suggests the table edited for consistency from one resource area to another. It is obvious that different resource specialist wrote each resource entry. We encourage editing for consistency to make it flow and be accurate in the representation of Proposed Action effects.
 - a. SER CD recommends a consistent narrative for the first of each “*Effects from No Action*” box in the table. We recommend stating “No impacts from LaVA project management actions; resources would be subject to natural processes. Risk of large-scale, high-severity wildfires in the existing beetle-killed stand conditions will continue. Effects from natural process may be negative and include ...”. Each resource should then go on to provide the potential effects from high-severity wildfires. This effect of the No Action alternative should not be left out of the table and ignored. See other resource-specific comments that follow.

- b. Timber: See a. SER CD requests other natural process effects (fire) be listed for the No Action Effects.
- c. Fire and fuels: See a. Should include firefighter / public safety from fire in the “Effects from No Action” column. Effects from “Modified Proposed Action”: add the word “potentially” after “would” and before “extinguish”.
- d. Wildlife, Effects from No Action column: Suggest replacing the first point “*There would be no effects beyond the existing condition to wildlife because no treatments or new roads would be implemented.*” with the consistent narrative suggested in 14a. What is meant in the second sentence “*...and proposed species.*”? There aren’t any proposed species for listing under the Endangered Species Act. Must add information to this column including: some species would benefit, some would have negative impacts from continued degradation of habitat. This section must also acknowledge the effects and risks of large-scale, high-severity wildfires that will potentially occur under the No Action Alternative. Consistency with the effects on wildlife and Canada Lynx analysis. Bullet number 2 on page i represents wildlife habitat much differently. Table 19 represents impacts to Canada Lynx much differently.
- e. Wildlife, Effects from Modified Proposed Action column: Revise the Canada Lynx portion (4th point in column) for consistency with the rest of the document. Many inconsistencies when it comes to the narratives regarding Canada Lynx. The last point on forest plan wildlife security guidelines should clarify if this is pertaining to the short-term or long-term.
- f. Aquatic species, Effects from No Action column: See a. This section must also acknowledge the effects and risks of large-scale, high-severity wildfires that will potentially occur under the No Action Alternative. The first statement references “management actions”. This is the No Action Alternative effects.
- g. Botany, Effects from No Action column: See a. This section must also acknowledge the effects and risks of large-scale, high-severity wildfires that will potentially occur under the No Action Alternative.
- h. Botany, Effects from Modified Proposed Action column: It states, “No effect for federally listed plant species.” In the No Action effects, it states “There are no federally listed, threatened, or endangered plant species...” Consistency.
- i. Rangelands and livestock management: See a. Under the Effects from Modified Proposed Action, second paragraph down, insert “and safer” between “easier” and “than”.
- j. Noxious weeds and other invasive plants: See a.
- k. Hydrology and soils: See a. “Severely burned soils” in Effects from Modified Proposed Action should also be in Effects from No Action. The last statement in the Effects from Modified Proposed Action needs clarification. Where do the numbers come from and what water quality effects? This information needs clarified or removed.
- l. Air quality and climate change: See a. The narrative for the Effects from Modified Proposed Action leads the reader to believe there are only effects from the “thinning overstock stands” vegetation treatment as this is the only one mentioned.
- m. Transportation: See a. The narrative for the Effects from No Action needs revised. “Opportunities to provide ... road closings.” The way it is written creates concerns. In the Effects from Modified Proposed Action, list the short-term effects first for readability.

- n. Recreation: See a. Suggest removing the last statement “Because no open roads would be closed, the public would still have access to the areas they have typically used.” in the Effects from No Action. The Effects from Modified Proposed Action is not consistent with information provided for other resources.
 - o. Lands and special uses: See a. The SER CD does not agree with the statement in the Effects from Modified Proposed Action that effects are “Same as no action”. This statement needs revision.
 - p. Heritage: See a.
 - q. Scenery: See a. In the Effects from Modified Proposed Action, we believe that understory vegetation obscures more than just the appearance of timber salvage. Understory vegetation obscures the appearance of many vegetation treatments.
 - r. Roadless characteristics: See a. The SER CD does not agree with the statement in the Effects from Modified Proposed Action that effects are “Similar to effects of the no-action alternative”.
 - s. Socioeconomic consequences: See a.
- 19) **Chapter 2, Table 19, page 57:** There are inconsistencies with the narratives regarding the Canada Lynx. The SER CD supports the narratives in this section over how Canada Lynx are presented in Table 17.
- 20) **Chapter 2, Table 20, page 57:** The SER CD doesn’t agree with the information included as effects for Ecological site conditions. Ecological sites in the “Comparison of impacts to major vegetation types (by indicators) between the modified proposed action and the no-action alternative” should present soils and vegetation information not air and water quality information.
- 21) **Chapter 2, Table 23, page 59:** The SER CD strongly disagrees with the statements “No change” under Alternative 1 – No Action. We recommend providing a better description including information from natural processes that will continue to occur. stating “No impacts from LaVA project management actions; resources would be subject to natural processes. Risk of large-scale, high-severity wildfires in the existing beetle-killed stand conditions will continue. Effects from natural process may be negative and include ...”. Each resource should then go on to provide the potential effects from high-severity wildfires. This effect of the No Action alternative should not be left out of the table and ignored. The information provided in the Alternative 2 – Modified Proposed Action should explain impacts. Currently they provide general information but not impacts.
- 22) **Chapter 3, Accounting Units narratives, pages 64-78:** The SER CD suggests the same information be presented in each of the 14 narratives for consistency. Some accounting unit narratives have watershed information and some do not. Also, there are inconsistencies in the number of acres when adding the three treatment category acres and inconsistencies between the narratives and table 24.
- 23) **Chapter 3, Tables 24 and 25, pages 79-81:** The SER CD requests the addition of columns to the table that include full suite of tools acres, limited suite of tools acres, and acres of no treatment.
- 24) **Chapter 3, Biological Resources, pages 82-152:** There are many inconsistencies in the format of each biological resource narrative. Some sections are missing entire narrative sections. At a minimum each biological resource section should include narratives for each of the following sections: the affected environment, environmental consequences direct and indirect effects for the no action alternative, environmental consequences direct and indirect effects for the modified proposed action alternative, cumulative effects of the no action alternative, and cumulative effects of the modified proposed action alternative. The SER CD requests these omissions be corrected for the Final EIS.

- 25) **Chapter 3, Biological Resources, pages 82-152:** The SER CD encourages the FS to include impacts in every biological resource environmental consequence direct and indirect effects for the no action alternative section regarding from the risk of large-scale, high-severity wildfires in the existing beetle-killed stands. Impacts from natural process may be negative. Each resource should then go on to provide the potential impacts from high-severity wildfires. These impacts of the No Action alternative should not be left out of the analysis and narrative.

Editorial Comments

The SER CD continually supports correcting clerical errors, removing unnecessary redundancies, and including language to clarify items in the DEIS. We offer the following editorial comments to improve the document. While there are others we identified in the document, there wasn't enough time to complete this list. Please contact us and we would gladly share more editorial comments that were identified.

1. Page 3, bulleted list. Include a “;” after the first bullet, a “; and” after the second bullet, and a “.” after the third bullet.
2. Page 9, third paragraph. Remove the word “would” and change “decrease” to “decreases”.
3. Page 14, Merchantability of Forest Products, second line from the bottom. Add the words “on page 20” after the words “see table 8”.
4. Page 14, Merchantability of Forest Products, line 5. Change “413,885” to “413,887”. The number of acres combined from Management Areas 5.13 and 5.15 is 413,887 as taken from Table 8 on page 20.
5. Page 16, Table 7 heading. Replace the extra “and” after the word “Purpose” with a “,”.
6. Page 22, Scoping Efforts, line 11. Insert a “,” between “August 10” and “2017”.
7. Page 23, Scoping Efforts, second line on the page. Remove the “s” from “frameworks”.
8. Page 28, Alternative 2, second to the last line on the page. Add an “s” to “National Forest System land”.
9. Page 31, last line. Change the word “outlined” to “listed”.
10. Page 37. Footnote 1 should appear on the previous page where appropriate.
11. Page 42, last paragraph, line one. Insert “(1-4)” after “diagrams” and before “depict”.
12. Page 51, Aquatic species Effects from Modified Proposed Action. Change the wording from “road construction and reconstruction activities” to “temporary road construction, reconstruction, and reclamation activities”.
13. Page 51, Aquatic species Effects from Modified Proposed Action. Add a “.” at the end of the second topic.
14. Page 56, Table 18. There is a footnote number after “Alternative 2 – Modified Proposed Action” but there isn't a footnote at the bottom of the page.
15. Throughout the document, inconsistencies exist when referencing the bark beetle epidemics. In some places “epidemic” is used and in others the plural “epidemics” is used. It is our understanding there was more than one bark beetle epidemic.
16. Page 58, Table 21. Suggest duplicating the language instead of saying “Same as above.”
17. Page 59, Table 23. There is a footnote number after “Alternative 2 – Modified Proposed Action” but there isn't a footnote at the bottom of the page.
18. Page 62, bullet 6. Correct the word after the “)” to “will”.
19. Page 62, bullets 6 and 7. Add a “.” to the end of the sentence for consistency.
20. Page 64, Rock Morgan Accounting Unit. The acres as listed for the accounting unit add up to 61,459 instead of 60,712 as stated in the narrative and table 24.

21. Page 66, Cedar Brush Accounting Unit. The acres as listed for the accounting unit add up to 57,723 instead of 57,725 as stated in the narrative and 57,724 listed in table 24.
22. Page 67, North Corner Accounting Unit. The acres as listed for the accounting unit add up to 44,909 instead of 44,908 as stated in the narrative and table 24.
23. Page 68, French Douglas Accounting Unit. The acres as listed for the accounting unit add up to 63,118 instead of 63,119 as stated in the narrative and table 24.
24. Page 70, West French Accounting Unit. The acres as listed for the accounting unit add up to 68,868 instead of 68,869 as stated in the narrative and table 24.
25. Page 73, Fox Wood Accounting Unit. Add “The Badger Creek fire burned through the southeast portion of the accounting unit in 2018.” at the end of the third paragraph.
26. Page 74, Battle Pass Accounting Unit. The acres as listed for the accounting unit add up to 44,351 instead of 44,551 as stated in the narrative.
27. Page 78, Jack Savery Accounting Unit. The acres as listed for the accounting unit add up to 75,391 instead of 75,390 as stated in the narrative and table 24.

Conclusion

Thank-you for the opportunity to comment during the National Environmental Policy Act process to develop a landscape-scale project that can adapt to changing conditions over an extended treatment timeframe. We look forward to our continued participation as a cooperating agency.

Sincerely,



Arla Strasser
Board Chair

AS/lc

Cc: Honorable Governor Matt Mead, Wyoming
Carbon County Commissioners
Laramie Rivers Conservation District
Little Snake River Conservation District
Medicine Bow Conservation District
Wyoming Department of Agriculture